

From: "Blend, Jeff" <jblend@mt.gov>
To: Tina Laidlaw/MO/R8/USEPA/US@EPA, "Suplee, Mike"
<msuplee@mt.gov>
Date: 09/02/2011 09:16 AM
Subject: FW: EPA document

Tina:

The attached documents are the EPA 1982 Guidance for Economic Analysis for private firms. The 1995 guidance appears to be built on these documents. The 1982 documents provide test for a plant level analysis versus a firm level analysis. The tests are different for a plant level analysis. One of the main questions asked is whether the plant would close as a result of pollution control. While the 95 Guidance probably trumps the 82 Guidance, can we still take a look at this?

Also, from the 95 Guidance:

" The analytic approach presented here can be used for a variety of private-sector entities, including commercial, industrial, residential and recreational land uses, and for point and nonpoint sources of pollution. The guidance provided in this chapter, however, is not meant to be exhaustive. The State and/or EPA may require additional information or tests in order to evaluate whether substantial and widespread impacts will occur. In addition, the applicant should feel free to include any additional information they feel is relevant." And

" Another possible scenario is that the discharger may shift to an alternative economic activity (e.g., manufacture another product or produce a different crop). While the applicant will not have gone out of business, this shift may result in reduced profits, employment, and purchases in the local community that must be considered. In each case, it is important to take the entire picture presented by the four ratios into account in judging whether or not the discharger will incur substantial impacts due to the cost of the necessary pollution reductions."

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-----Original Message-----

From: Suplee, Mike
Sent: Tuesday, February 17, 2009 2:37 PM
To: Blend, Jeff
Subject: FW: EPA document

Hi Jeff;

When you get a chance, take a look at these older EPA documents, especially the "Workbook_econ..."

These were the documents that EPA suggests permit writers use to come up with Effluent Limit Guidelines for industries if they have to do it themselves (no EPA value established). ELGs are technology-based means of controlling a given pollutant and are industry specific.

Note how similar the guidance is to our S & W private-sector work. This to me is good as it means we can develop one process (rather than two) to determine what the effluent for N and P should be for a private entity.

Thanks, Mike

-----Original Message-----

From: Rowe.Rosemary@epamail.epa.gov [
mailto:Rowe.Rosemary@epamail.epa.gov]
Sent: Tuesday, February 17, 2009 2:27 PM

To: Suplee, Mike
Cc: Laidlaw.Tina@epamail.epa.gov
Subject: Fw: EPA document

Rosemary Rowe
NPDES Program
Montana Office

Environmental Protection Agency
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10 West 15th Street, Suite 3200
Helena, MT 59626

406-457-5020 (phone)

406-457-5055(fax)

----- Forwarded by Rosemary Rowe/MO/R8/USEPA/US on 02/17/2009 02:27 PM

Bruce

Kent/P2/R8/USEPA

/US

To

Rosemary Rowe/MO/R8/USEPA/US@EPA

02/17/2009 02:13

cc

PM

Subject

Re: Fw: EPA document(Document

link: Rosemary Rowe)

From the EPA NPDES Web Page Publications link.

http://cfpub.epa.gov/npdes/pubs.cfm?program_id=0. Key word:Economic, Program Area:Industrial & Commercial Facilities

(See attached file: protocol_npdespermits.pdf)(See attached file: workbook_econ_permits.pdf)

Bruce Kent

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USEPA Region 8

8P-W-WW

1595 Wynkoop St.

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Rosemary
Rowe/MO/R8/USEPA
/US To
Bruce Kent/P2/R8/USEPA/US@EPA
02/17/2009 01:42 cc
PM
Subject
Fw: EPA document

Do you have any idea if the document requested below can be located and if so, where?

Thanks,
Rosemary

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----- Forwarded by Rosemary Rowe/MO/R8/USEPA/US on 02/17/2009 01:42 PM

Tina
Laidlaw/MO/R8/US
EPA/US To
Rosemary Rowe/MO/R8/USEPA/US@EPA
02/17/2009 01:33 cc
PM
Subject
Fw: EPA document

Tina Laidlaw
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----- Forwarded by Tina Laidlaw/MO/R8/USEPA/US on 02/17/2009 01:35 PM

"Suplee, Mike"
<msuplee@mt.gov>
To
02/17/2009 01:23 PM Tina Laidlaw/MO/R8/USEPA/US@EPA
cc

Subject
EPA document

Hi Tina;

I think this may be something that Rosemary Rowe could better address, but anyway...

Since it sounds like we will not have many ELGs to rely on for N and P industrial dischargers, the CWA says a permit writer can use BPJ to come up with their own ELGs. And rolled into that process is economic consideration. Sounds like the Substantial and Widespread process would have to be reconciled with economical ELG development. But anyway...

I am looking for this document which I could not find on the internet:

USEPA, 1982. Workbook for Determining Economic Achievability for NPDES Permits (Draft). Permits Division, Prepared by Ptnam, Wayes & Bartlett, Inc.

Could you help?

Thanks, Mike

(See attached file: protocol_npdespermits.pdf)(See attached file:
workbook_econ_permits.pdf)

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